

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:

RAQUEL DEVEESE CONAWAY,
1417 East Sharpe Avenue
Nashville, TN 37206
SSN: XXX-XX-8152

Debtor(s).

Bk. No. **15-00663-RM3-13**
Chapter 13
Judge Randal S. Mashburn

THE DEADLINE FOR FILING A TIMELY RESPONSE IS: September 1, 2017
IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: September 13, 2017 at 8:30 a.m. in Courtroom 1, 2nd
Floor Customs House, 701 Broadway, Nashville, Tennessee 37203

TRUSTEE'S REQUEST FOR HEARING ON DEBTOR'S
MOTION TO MODIFY PLAN

Henry E. Hildebrand, III, Standing Trustee for Chapter 13 matters in the Middle District of Tennessee, respectfully requests this Court set for hearing the application filed by the debtor seeking to modify the confirmed plan to provide for the post-petition financing and acquisition of an automobile.

The debtor is compensated only ten months of the year and has failed to make payments in support of the plan in the summers of 2016 and 2017. The debtor has not explained how payments would be made to the Trustee during the summer months when the debtor is unemployed.

WHEREFORE, THE PREMISES CONSIDERED, the Trustee requests this Court set for hearing the application filed by the debtor seeking to modify the plan.

Respectfully submitted,

/s/ Henry E. Hildebrand, III

Henry E. Hildebrand, III
Chapter 13 Trustee
P. O. Box 340019
Nashville, TN 37203-0019
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pleadings@ch13nsh.com

CERTIFICATE OF SERVICE

I, the undersigned, hereby certifies that on or before the 30th day of August, 2017, a true and correct copy of the foregoing has been served in the following manner:

Email by Electronic Case Noticing to:

U. S. Trustee
Long Burnett & Johnson, Counsel for Debtor

By U. S. Postal Service, postage prepaid to:

Raquel D. Conaway, 1417 East Sharpe Avenue, Nashville, TN 37206

/s/ Henry E. Hildebrand, III

Henry E. Hildebrand, III
Chapter 13 Trustee